

**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF THE INSPECTOR GENERAL**

**AUDIT OF BACKGROUND AND TRAINING  
OF SECURITY PERSONNEL AT  
DISTRICT OF COLUMBIA  
PUBLIC SCHOOLS**



**AUSTIN A. ANDERSEN  
INTERIM INSPECTOR GENERAL**

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Office of the Inspector General**



Inspector General

July 15, 2005

Clifford B. Janey  
Superintendent  
District of Columbia Public Schools  
825 North Capitol Street, N.E., 9<sup>th</sup> Floor  
Washington, D.C. 20001

Charles H. Ramsey  
Chief of Police  
D.C. Metropolitan Police Department  
300 Indiana Ave. N.W., Room 5080  
Washington, D.C. 20001

Dear Dr. Janey and Chief Ramsey:

Enclosed is our final audit report summarizing the results of the Office of the Inspector General's (OIG) Audit of Background and Training of Security Personnel at District of Columbia Public Schools (OIG No. 03-2-14GA(c)).

As a result of our audit, we directed 10 recommendations for necessary actions to correct the described deficiencies. We received responses from the Superintendent of the District of Columbia Public Schools (DCPS) and the Chief of Police of the Metropolitan Police Department (MPD), respectively, on June 24, 2005, and July 8, 2005. DCPS' and MPD's responses fully addressed all but one of the recommendations, and we consider the actions currently on-going and/or planned to be responsive to our remaining recommendations. We request that DCPS and MPD provide additional comments to Recommendation 10 that fully meet the intent of the recommendation. The full text of DCPS and MPD's responses are included, respectively, at Exhibit B and Exhibit C.

While we did not direct any recommendations to Watkins Security Agency of the District of Columbia, Inc. (Watkins, Inc.), we provided a courtesy copy of our draft report to the company. We received a response, dated June 28, 2005, from Watkins, Inc. The full text of the response is included at Exhibit D.

Dr. Janey, DCPS and Chief Ramsey, MPD  
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We appreciate the cooperation and courtesies extended to our staff during the audit. If you have questions, please contact William J. DiVello, Assistant Inspector General for Audits, at (202) 727-2540.

Sincerely,

A handwritten signature in blue ink, appearing to read "Austin A. Andersen", with a long horizontal flourish extending to the right.

Austin A. Andersen  
Interim Inspector General

AAA/kb

cc: See Distribution List

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**AUDIT OF BACKGROUND AND TRAINING OF SECURITY  
PERSONNEL AT DISTRICT OF COLUMBIA PUBLIC SCHOOLS**

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## EXECUTIVE DIGEST

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### OVERVIEW

This audit is the seventh in a series of audits by the District of Columbia Office of the Inspector General (OIG) that evaluates the District of Columbia Public Schools' (DCPS) management and operation of the school security program. This draft report summarizes the results of our review of the adequacy of training and pre-employment background investigations for contracted school security personnel. We reviewed several areas of the background and training requirements as stipulated in the DCPS security contract. Additionally, we analyzed the diversity and demographics of the security force. Prior to the completion of this audit, we briefed DCPS and Metropolitan Police Department (MPD) officials so that, when necessary, appropriate corrective actions could be initiated.

The first two reports that we issued covered DCPS' management of homeland security funds and procurement of school security services for the period October 1996 to July 2003. The third report addressed the solicitation and award of the school security services contract with the Watkins Security Agency of the District of Columbia, Inc. (Watkins, Inc.). The fourth report dealt with the DCPS incident reporting process from initiation to final disposition, and the fifth report addressed physical security at DCPS. The sixth report presented a comparison of DCPS school security business practices with comparable school districts in other jurisdictions. We plan to issue an additional audit report that will focus on the billing practices relative to the former DCPS security contractor.

### CONCLUSIONS

Internal control weaknesses in the pre-employment hiring process of DCPS contract security personnel led to the questionable placement of some security officers working in the District's school system. This condition was caused by: (1) the security contractor and MPD's need to better coordinate on sharing employee background information; (2) the contractor's need to consistently perform background verifications such as credit checks, employment history, and character references for all prospective security officers; (3) the contractor and MPD's need to maintain all of the required pre-employment documentation for each applicant; and (4) DCPS' need to provide sufficient oversight in monitoring this program. As a result, there are contracted security personnel working in DCPS who may pose a risk to the secure environment of students and staff. The security officers' licenses may not have been granted had their criminal background and other pre-employment information been sufficiently reviewed by the contractor and responsible District officials.

Additionally, the contractor did not fully meet the contract requirements for security training. We determined that 77 percent of reviewed test scores were unsupported in the contractor's training records, and there were no reasonable means to determine the basis for providing passing grades to individuals attending training courses. Further, the course covering the conduct of searches and seizures did not employ sufficient and effective instructional techniques to achieve proficiency in this subject matter. Lastly, the District does not have a

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## EXECUTIVE DIGEST

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set of training policies that address the training required for officers of private security firms operating under District contracts. As a result, there is no assurance that all contracted school security personnel possess the requisite skills to ensure the safety and security of DCPS students and faculty.

We believe that the comprehensive plan for school security and the recent Child and Youth, Safety and Health Omnibus Amendment Act of 2004 appear to address and in some respects remedy, the deficiencies noted in the report.

### RECOMMENDATIONS

We directed 10 recommendations to DCPS and MPD that we believe are necessary to correct the deficiencies noted in this report. The recommendations, in part, center on:

- Improving coordination with the security services contractor to ensure that information regarding applicants for security personnel positions meets all of the requirements for background inquiries/verifications;
- Monitoring the school security contractor to ensure that background verifications are performed for all prospective security personnel prior to employment;
- Maintaining contractor background verification files to ensure that complete pre-employment documentation has been obtained for each prospective employee;
- Establishing controls that ensure school security personnel attend and pass all required courses to maintain the license MPD issues for contracted school security personnel;
- Ensuring that security contractors report all disciplinary actions to the police; and
- Ensuring that contractors address the diversity of the security workforce to better reflect the diversity of the student body in the District of Columbia.

A summary of potential benefits resulting from this audit is included at Exhibit A.

### MANAGEMENT RESPONSES AND OIG COMMENTS

DCPS and MPD provided written responses to our draft report, respectively, on June 24, 2005, and July 8, 2005. DCPS' and MPD's responses fully addressed all but one of the recommendations, and we consider the actions currently on-going and/or planned to be responsive to our recommendations. We request that DCPS and MPD provide additional comments to Recommendation 10 that fully meet the intent of the recommendation. The full text of DCPS' and MPD's responses are included, respectively, at Exhibit B and Exhibit C.



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## **EXECUTIVE DIGEST**

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We also received a response, dated June 28, 2005, from Watkins, Inc. The full text of the response is included at Exhibit D.

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## INTRODUCTION

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### BACKGROUND

DCPS is an independent agency with its own contract security force, which has the responsibility of providing security and related services at DCPS locations. These services include armed security officers for administrative offices, roving patrols, and unarmed fixed-post security officers.

DCPS maintained in-house security personnel and programs for school security for over 25 years. However, in the mid-1990's, DCPS was mandated by law<sup>1</sup> to out-source school security services. Since then, two firms were contracted to provide school security services for District schools. The first firm was awarded a contract in August 1996, with the contract ending in July 2003. The second firm was awarded a contract in July 2003.

**Contract Similarities.** The school security contracts stipulate that the contractors will provide trained and licensed employees at all times to perform the services, as prescribed by the contracts, post orders, and the officer's handbook. In the event of a conflict among these documents, the contract provisions take precedence.

In addition, both contracts stipulate that the contractor will conduct and document background investigations to verify that each security officer meets the specified qualifications and standards prior to assigning a security officer to the contract. At a minimum, the background investigation must address each security officer's credit check, employment history for the last 10 years, and other areas. The contracts also stipulate that the contractor will:

- provide manpower, uniform materials, equipment, transportation, administrative support, training, and other services to provide security services at approximately 160 sites;
- conduct police background clearance checks from the District of Columbia and the employee's state of residence, if other than the District, prior to employment;
- maintain personnel files on all employees hired to perform under the contract;
- be responsible for taking disciplinary action with respect to its employees; and
- be responsible for having each prospective security officer undergo a pre-employment medical examination.

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<sup>1</sup> The District of Columbia School Reform Act of 1995, Pub. L. No. 104-134, sec. 2751, 110 Stat. 1321 (1996), requires the D.C. Board of Education to enter into a security services contract on behalf of the District schools for academic year 1995-96 and each academic year thereafter.

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## INTRODUCTION

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**Contract Technical Differences.** There were technical differences between the two contracts relevant to criminal background histories and training specifications. Specifically, the initial contract required that security officers could not have a felony or misdemeanor conviction of their records. The current contract stipulates that a person eligible to perform under the contract must be licensed as required by the MPD Security Officers Management Branch (SOMB). The SOMB's policy manual provides Special Police Officer (SPO) applicants will be declared ineligible for a license if they have been convicted of a felony within the preceding 10 years, or a misdemeanor within the preceding 5 years. In either instance, the contractor must immediately remove the individual from employment. Failure to comply with this requirement may be cause for terminating the contract.

The initial contract required the contractor to conduct formal training using persons who are certified as qualified to instruct or teach the specific subject or topic required. No specific areas of training were stipulated, with the exception that all personnel complete an approved American Red Cross or American Heart Association course in adult, community, or professional rescuer cardiopulmonary resuscitation (CPR), and in first aid. The current contract addresses the above mentioned courses in addition to a specific curriculum of 80 basic hours of training in:

- crisis intervention/conflict management
- laws of arrest-search and seizure
- criminal law
- medical emergencies and bloodborne pathogens
- fire safety and prevention
- hazardous materials
- bomb threat procedures
- crime scene protection
- evidence collection
- sexual harassment and discrimination
- use of force
- report writing
- interview techniques
- professional ethics and standards
- DCPS security procedures manual
- security technology operations
- additional training designated by the Contracting Officer's Technical Representative

Further, the security contractor's management and support personnel must be licensed and experienced in security protection services; have been trained by either a federal, state, or military law enforcement organization; or have received equivalent in-house security training.

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## INTRODUCTION

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Additionally, article III, section A.8.1.1 of the initial contract stipulates that “[a]ll security officers whether armed or unarmed shall be qualified as ... SPOs for the District of Columbia with the authority to enforce laws, rules, regulations, as well as detain suspects for questioning and/or make arrests.” In contrast, section C.9.1.1 of the current contract stipulates that “[a]ll security officers, except School Resource Officers, whether armed or unarmed, shall be qualified as ... (SPOs) for the District of Columbia with the authority to enforce laws, rules, regulations, as well as detain suspects for questioning and/or make arrests.” However, the School Resource Officer position description in section C.6.2.5 stipulates that School Resource Officers “shall be licensed ... in the District of Columbia.”

### **MPD’s Role in the Background Investigation Process**

Through its SOMB, MPD performs the police background clearance checks on the security officers, and issues the SPO licenses to the security officers. In fact, MPD processes and issues licenses for all private security personnel in the District through the SOMB. MPD issues licenses for approximately 11,000 private security officers and investigators each year throughout the District. Additionally, MPD exercises oversight for personnel re-classifications, license renewals, resignations, and terminations. MPD also conducts investigations into disciplinary issues relating to security personnel.

### **Background Investigation Process**

Applicants for a SPO license must complete a MPD application and an affidavit, and submit both documents to the contractor. The application must contain the applicant’s original signature, and the affidavit must be notarized by a notary public. Both the application and affidavit must list any criminal arrests or charges (non-convictions or convictions). When the applicants submit their applications and affidavits to the contractor, the contractor signs the applications and provides the documents to the applicants, who provide the documents to SOMB.

When the applicants bring their applications and affidavits to SOMB, SOMB fingerprints the applicants, and submits the fingerprints to the Federal Bureau of Investigation (FBI) for comparison purposes. In addition, SOMB conducts a criminal history inquiry through the FBI’s Interstate Identification Index for each applicant. If the results reveal that the applicant was previously arrested for a criminal offense and there is no record of a final disposition, the applicant is required to obtain a certified copy of the disposition from the jurisdiction where the arrest occurred. SOMB also conducts background investigations, which require the applicants to have a drug test and medical examination. If the applicant is determined to be eligible for a SPO license, SOMB forwards a recommendation to the Chief of Police for final approval, and provides written notification to the applicant.

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## INTRODUCTION

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### OBJECTIVES, SCOPE, AND METHODOLOGY

The objectives of this phase of our audit were to determine whether:

1. DCPS and the security contractor implemented controls to ensure that only competent and qualified personnel are hired and entrusted with the security and safety of DCPS students and faculty; and
2. DCPS and the security contractor initiated controls to assure that personnel with criminal violations and suitability issues that would jeopardize the health and safety of DCPS students and faculty were not hired.

To accomplish our objectives, we reviewed the background and training requirements for security personnel in the current school security contract with Watkins, Inc. We randomly selected 30 of the 400 security officers assigned by Watkins, Inc. to the DCPS for the school year 2003-2004. We then compared and analyzed the DCPS and the contractor's efforts to ensure that proper background checks and training were provided and in compliance with the contract. We conducted background checks for the 30 security officers through applicable court records to establish data reliability. Also, we reviewed the personnel files and training records maintained by the contractor, and the background checks conducted by the SOMB.

In addition, we conducted interviews with the DCPS security staff, the contractor's staff, and MPD personnel, as well as other related parties, concerning the efforts and procedures in place to provide competent and qualified security personnel. We also observed training sessions for the security force conducted at the DCPS security headquarters and at H.D. Woodson High School.

Our audit was conducted in accordance with generally accepted government auditing standards and included such tests as were considered necessary under the circumstances.

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## FINDINGS AND RECOMMENDATIONS

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<b>FINDING 1: PRE-EMPLOYMENT HIRING PROCESS</b>
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### SYNOPSIS

Internal control weaknesses in the pre-employment hiring process of DCPS contract security personnel led to the questionable placement of some security officers working in the District's school system. This condition was caused by: (1) the security contractor and MPD's need to better coordinate on sharing employee background information; (2) the contractor's need to consistently perform background verifications such as credit checks, employment history, and character references for all prospective security officers; (3) the contractor and MPD's need to maintain all of the required pre-employment documentation for each applicant; and (4) DCPS' need to provide sufficient oversight in monitoring this program. As a result, there are contracted security personnel working in DCPS who may pose a risk to the secure environment of students and staff. The security officers' licenses may not have been granted had their criminal background and pre-employment information been sufficiently reviewed by the contractor and the MPD.

### DISCUSSION

We randomly selected 30 out of a total of 400 DCPS contract security personnel for the school year 2003-2004. For each of the 30 contract security personnel, we researched whether any of the sampled contract security personnel had criminal backgrounds. We also reviewed pre-employment documentation to determine if contract security met all pre-employment qualifications for SPO licensing.

#### *Background Investigations*

We found that 8 of the 30 sampled contract security personnel had criminal background histories. Four of the 8 employees acknowledged their past criminal histories on their affidavits and MPD employment forms when they applied for their jobs. Their criminal histories did not prevent them from obtaining a SPO license under the MPD policy and, therefore, were not considered for further review.

The remaining four employees did not acknowledge their criminal background during the pre-employment process, as required by MPD policy. Two of the four employees had felony convictions and were approved for licensing as an SPO by the MPD. The criminal histories for these four employees are discussed below:

- One applicant was arrested in February 1998 for possession of cocaine with the intent to distribute. The case was not prosecuted, however.

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## FINDINGS AND RECOMMENDATIONS

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- The second applicant was arrested in March 2001 for possession of marijuana. This applicant was issued a failure to appear warrant, but the applicant was not prosecuted. In June 2003, this applicant was arrested for misdemeanor theft but the prosecution was dropped.
- The third applicant was arrested four times. In November 1997, the applicant was arrested for distributing counterfeit money. On May 27, 1998, the applicant was arrested as a fugitive for the November 1997 charge, but the case was not prosecuted. In April 1998, the applicant was arrested for simple assault; however, the applicant was not prosecuted for this offense. On May 29, 1998, the applicant was arrested for forgery and uttering (delivering counterfeit money). The applicant was found guilty in October 1998 for this felony charge.
- The fourth applicant was arrested in February 1992 for the unauthorized use of a vehicle, and in July 1994, for assault with a dangerous weapon. The applicant was convicted and sentenced in October 1994 for the felony assault charge. This person had two distinct affidavits regarding his criminal history. The affidavit in the contractor's file (employment application) stated that there were no criminal arrests or charges, and a second affidavit found in the MPD file indicated that the applicant had two arrests.

Although MPD had access to applicants' criminal background histories during the pre-employment process, MPD did not share this information with DCPS or the contractor. Had MPD released this information to the contractor, the contractor could have taken corrective actions against the four employees who falsified their pre-employment documentation. However, until corrective actions are taken, there will be contract security personnel working in DCPS that may pose a risk to the secure environment of students and staff.

### ***Contractor Personnel Files***

Based on our review of the contractor's personnel files, we found that the contractor did not always maintain the minimum pre-employment documents needed for certification, licensing, and hiring in the personnel files of the security officers. The contractor did not follow-up on the character and employment references provided by the employee. We determined that 24 of 30 personnel files did not have support for the required pre-employment medical examinations, and 10 of the 30 personnel files did not have support for the required drug screening.

We also found that the contractor did not perform credit checks for the 30 applicants when they applied for the security positions, although their personnel files contained authorizations to perform these checks. Similarly, the contractor did not follow-up on the character and employment references provided by the applicants, although the employment applications provided character references and employment history information.

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## FINDINGS AND RECOMMENDATIONS

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The contractor's administrative personnel stated that they do not have the resources to follow-up on the credit history, character references, and employment history of each applicant. Therefore, these checks are done on an as-needed basis. However, our examination of the contractor's personnel records found no instances where these checks had been performed.

### *Maintaining Complete MPD Licensure Files*

When we reviewed the 30 security officers' personnel files maintained by MPD, we found that 11 files were missing certain required documentation to support the approved security licenses. The missing documentation included notarized affidavits, results of drug screening, results of criminal background checks, and physical examination records.

The MPD's SOMB Identification and Records Division Policy Manual (undated) requires that:

- Each applicant shall submit a completed application supplied by the Chief of Police, along with a notarized affidavit, that lists criminal arrests or charges (non-convictions and convictions). When new applications and affidavits are obtained from an employer, the employer must ensure that all criminal charges are listed on the application and affidavit.
- Each applicant must be fingerprinted by MPD for the purpose of obtaining a criminal clearance. The fingerprints will become a part of the record and shall be retained by MPD.
- A criminal history inquiry shall be verified through the FBI's Interstate Identification Index for each applicant.
- A background investigation of each applicant is conducted by the MPD. After completion, a recommendation is sent to the Chief of Police for approval. Written notification of each approval is forwarded to the applicant's residence of record.
- SPO applicants will be declared ineligible for a commission if there is any falsified information on any of the forms provided by the Chief of Police to establish eligibility.

The following is a breakdown of the missing documentation within the 11 personnel files:

- One file contained only the SPO application and no other required documentation, such as the affidavits, background check, medical, and drug examinations.



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## FINDINGS AND RECOMMENDATIONS

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- Two files had no affidavit acknowledging whether the applicant had a criminal history.
- One file had no evidence that MPD conducted a criminal background inquiry on the prospective employee.
- One file did not have the results of a drug screening test.
- Six files did not have documentation indicating that prospective employees obtained physical examinations.

Further, we found that two personnel files contained licenses which were issued for prior employment but did not have updated license documentation reflecting the current employer/contractor. The MPD policy stipulates that a security guard/SPO who holds a valid commission and wishes to transfer his commission to another employer must submit a completed application, filed jointly in the name of the SPO and the new employer.

The MPD's internal controls to maintain the volume of transactions and documentation are not sufficient to prevent the loss of pertinent documents. The MPD files had no checklists or verification of receipt, and there was no uniformity or specific order for the documents to be maintained in the files.

MPD maintains a manual system of records and files regarding the licensure of approximately 11,000 security personnel throughout the District. Several documents are required of each security applicant or employee for licensing as either a security officer or SPO, and are maintained by the MPD. The large volume of daily transactions affects the demand on resources to maintain this information. Notwithstanding these limitations, we found that the lack of effective internal controls at MPD jeopardizes the review and approval process for security personnel seeking licenses in that there is no assurance that MPD properly performed all of the required tests to establish eligibility for each license it issued to security personnel.

## RECOMMENDATIONS

We recommended that the Superintendent, D.C. Public Schools, and Chief of Police, Metropolitan Police Department:

1. Coordinate with the security services contractor to ensure that the criminal histories and results of inquiries for security personnel are disclosed to all interested parties.
2. Monitor the school security contractor to ensure that background verifications are performed for all prospective security personnel prior to employment.

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## **FINDINGS AND RECOMMENDATIONS**

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3. Periodically review contractor background verification files to ensure that employment files are complete and required documentation has been obtained for each employee.

### **DCPS' RESPONSE**

DCPS concurred with the recommendations. DCPS' full response is included at Exhibit B.

### **MPD'S RESPONSE**

MPD has provided detailed actions taken and planned to address all of above recommendations and correct noted deficiencies. MPD's full response is included at Exhibit C.

### **OIG'S COMMENT**

We consider DCPS' and MPD's actions to be responsive to the above recommendations and meet the intent of the recommendations.

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## FINDINGS AND RECOMMENDATIONS

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<b>FINDING 2: SECURITY OFFICER TRAINING</b>
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### SYNOPSIS

The contractor did not fully meet the contract requirements for security training. We determined that 77 percent of reviewed test scores were unsupported in the contractor's training records, and there were no reasonable means to determine the basis for providing passing grades to individuals attending training courses. Further, the course covering the conduct of searches and seizures did not employ sufficient and effective instructional techniques to achieve proficiency in this subject matter. Lastly, the District does not have a set of training policies that addresses the training required for officers of private security firms operating under District contracts. As a result, there is no assurance that all contracted school security personnel possess the requisite skills to ensure the safety and security of DCPS students and faculty.

### DISCUSSION

#### *Supporting Test Score Results*

We reviewed the test scores for the 30 sampled security officers. The threshold for passing the training course was 70 percent, and we determined that the average score for 7 of the 30 officers exceeded 80 percent. However, our review showed that 23 of the 30 security officers had no support on file for the passing numeric score. Of the 23 security officers, there were 17 who received only a "P" for a passing mark. Another 3 of the 23 security officers had an "X" to indicate that courses had been taken in December 2003, but no scores were provided. In addition, 3 of the 23 applicants had neither scores nor letter marks. The majority of the security force was trained prior to January 2004, during the transition phase of the contract (August through December 2003).

Due to the inconsistency of test scores in the training records, we have serious concerns about the qualifications of and training provided to the contract security force. The "P" grade assigned to 17 individuals (57%) was not sufficient to establish that these individuals completed the minimum training requirement. The three individuals (10%) whose training files recorded an "X" indicate at best, that the individuals were present for the course. The three individuals (10%) whose training files had no scores or letter marks clearly give rise to the question of whether these individuals actually took the course or the exam. Due to the lack of record keeping, the integrity of the training during the transition phase is questionable, and many of these officers are current employees with the contractor.

We asked the project manager about the reliability of training data in the personnel files, but a satisfactory explanation was not furnished. The contractor's Chief Executive Officer

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## FINDINGS AND RECOMMENDATIONS

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provided us a statement acknowledging that his staff was experiencing difficulty in locating some test scores prior to January 2004. However, we noted the contractor has improved its reporting of test scores results.

### *Search and Seizure Training*

We believe one of the more critical tasks assumed by a school security force is its ability to detect and prevent the smuggling of weapons into a school. While metal detectors, x-ray machines, and hand-held sensors or wands are in use, any student who triggers an electronic alarm and refuses to acknowledge that there is an unidentified metal object on his or her person has to be frisked. The student's person must be physically touched to locate, identify, and confiscate the hidden metal object. This process is called a search and seizure.

Contract GAGA-2002-C-0012, section C.4 on security training stipulates that "Laws of Arrest-Search and Seizure" should be a minimum requirement for a training curriculum. The contract did not provide a description of the requirement nor emphasize the physical nature of the training. The contract did, however, recognize the legal ramifications of search and seizure. We found no other criteria that addressed training requirements for security personnel within the District of Columbia.

We found the following conditions in evaluating the search and seizure training:

- The DCPS security force contract did not have specific instructions stipulated in the contract to address all search and seizure issues.
- The contractor did not reinforce techniques for search and seizures. Classroom training concentrated on the legalities of what constitutes search and seizure, and on articulating and justifying actions in detail to prosecutors and courts. Instructors also discussed Fourth Amendment implications to search and seizure and the different types of seizures. Security personnel were required to complete written examinations based on these issues; however, there is no requirement for students to pass a practical test.

Further, we observed the application of search and seizure techniques in a classroom setting, and concluded that more emphasis should be placed on instructional techniques because the instructors did not provide every security student the opportunity to acquire the necessary skills to properly conduct search and seizure. In a classroom of approximately 25 new hires and veteran security personnel, we found that only 6 participated in search and seizure skill training exercises. However, only 3 of the 6 security officers in this exercise were able to detect hidden weapons during the search and seizure demonstrations held by the instructors. This exercise was not followed-up during the training session to improve the performance or to reinforce the technique of each student in the class, thereby denying each person the opportunity to satisfactorily conduct search and seizure techniques. Consequently, the

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## FINDINGS AND RECOMMENDATIONS

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majority of the class did not participate in these drills and did not test a critical skill that is necessary for the day to day requirements of their positions.

Since search and seizure is one of the more critical skills needed to prevent weapons and other prohibited paraphernalia from coming into the schools, security officers should be able to perform search and seizure techniques at a level similar to the skill levels required to obtain CPR and first aid certification. Each security officer must complete a structured course of instruction and hands on examinations for both first aid and CPR to obtain their SPO licenses. However, we believe this level of skill is lacking when applied to the search and seizure practices.

In summary, the level of practical application of search and seizure techniques did not provide all student security officers with the skills needed to properly conduct a search and seizure, as appropriate, of persons entering the schools. The contractor is required to obtain and provide instruction to ensure that security personnel are properly and fully trained before they are deployed. There is a failure to do this; therefore, the overall safety of the student body and faculty throughout the District is at risk. The number of weapons and illegal substances that enter the schools undetected cannot be calculated or quantified, but deterrence could be enhanced if the training phase were more comprehensive.

### ***School Security Contract Addresses Only Minimum Training Requirements***

The minimum training requirements prescribed in the contract did not sufficiently address all aspects of the training, and the DCPS Security Division had no criteria on which to base these minimum requirements. Although the contract listed certain training to be provided to security personnel, the contractor provided additional courses to the curriculum that were not covered by the DCPS contract requirement. Additions to the course curriculum consisted of asset protection and security, civil law and civil liability, communications, patrols and fixed post, and commercial procedures. Additional "Effective Crisis Intervention" training was provided by the contractor as a part of its 40-hour Basic Security Officer Training (for new hires) during 2004. The D.C. Fire and Emergency Medical Services Department provided fire hazard and safety training during 2004 to all security force employees because several fires were set in schools. We believe, however, that MPD oversight is needed to provide an effective curriculum for training contracted security personnel within the District.

### ***Policies and Regulations Do Not Address Minimum Training Requirements***

There is no current minimum regulatory training requirement for security officers and special police officers within the District of Columbia. Neither MPD's policy manual nor Titles 6A and 17 of the DCMR address performance training requirements for private security forces. The MPD policy manual stipulates all of the criteria necessary for security officers and special police officers to obtain licenses to perform their duties within the District; however, the policy addresses only training requirements for annual firearms licensing. Most security

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## FINDINGS AND RECOMMENDATIONS

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officers in the school system are not allowed to carry firearms and generally are not affected by this requirement. Initial training and continuous professional training need to be addressed to establish measurable performance standards for contracted security personnel within the District.

### *New Policy Manual under Development*

MPD officials indicated that a new policy manual was being developed, but they could not provide a time when it would be approved and issued. The current policy manual is undated and we could not determine when it was last updated.

We believe the updated manual should include a regulatory training requirement for District security personnel to enable the District to hold security agencies accountable for their personnel. Such a training requirement would provide standardized training and a curriculum for the licensing of all contract security personnel and would also identify specific training courses and a curriculum that security personnel would need to maintain professional proficiency. As a result of the development and enforcement of uniform standards, services provided by security agencies would be improved.

## RECOMMENDATIONS

We recommended that the Chief of Police, Metropolitan Police Department, in coordination with the Superintendent, D.C. Public Schools:

4. Identify the training courses and curriculum that school security personnel must satisfy to maintain proficiency, and incorporate these new standards in the new policy manual.
5. Establish requirements that school security personnel must attend and pass all required courses to maintain the license MPD issues for contracted school security personnel.
6. Establish a policy to suspend or recall a license issued to school security personnel when required training has not been obtained or a passing grade not achieved.
7. Amend MPD policy establishing MPD oversight over contractors' course curriculum to ensure that: (a) the required courses are given to school security personnel; (b) essential training standards are maintained to achieve course effectiveness; and (c) all training records are maintained to support grades and test scores.

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## **FINDINGS AND RECOMMENDATIONS**

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### **DCPS' RESPONSE**

While DCPS concurred with Recommendation 4, DCPS did not respond to Recommendations 5 through 7. DCPS stated these recommendations are solely under the purview of MPD and its operation of the school security contract that commenced on July 1, 2005. DCPS' full response is included at Exhibit B.

### **MPD'S RESPONSE**

MPD has provided detailed actions taken and planned to address all of above recommendations and correct noted deficiencies. MPD's full response is included at Exhibit C.

### **OIG'S COMMENT**

We consider DCPS' and MPD's actions to be responsive to the above recommendations and meet the intent of the recommendations.

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## OTHER MATTERS OF INTEREST

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<b>DEMOGRAPHICS/DIVERSITY OF THE SCHOOL SECURITY STAFF</b>
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### DISCUSSION

The District of Columbia is a culturally diverse city, which is reflected in the student body enrolled in DCPS. As part of our audit, the former Superintendent requested that we review the racial demographic for the school security staff, and determine if the racial demographic was in-line with the student population. We reviewed the racial demographic, along with other demographics that we believed were important, for the 30 security officers included in our training and background review. We analyzed information according to race, gender, age, education level, residency, and security experience. In addition, we determined if the demographics were consistent with the contract requirements. Our findings are as follows.

**Race.** The security contract stipulates the contractor must be an equal opportunity employer. However, the contract does not contain provisions for maintaining a diversified workforce, and assigning security officers to schools accordingly. We believe it is important to have a security force at each school that is representative of the student population to ensure the officers and students can effectively communicate. For example, a security force that is representative of the student population will ensure there are no language barriers.

All of the security officers included in our sample were African-American. In addition, when we visited schools with a significant Hispanic population during the 2003-2004 school year, we observed the entire security force at these schools was African-American. School officials at these schools indicated they would prefer to have security personnel that could better relate to the Hispanic population. The following table shows the racial breakdown for DCPS' student population.

**Table 1. Racial Breakdown for Student Population**

Race	Number of Students	Percent
Asian	1,124	1.7%
African-American	54,429	83.6%
Hispanic	6,344	9.7%
Native American	35	0.1%
White	3,167	4.9%

Source: DCPS' website

**Gender.** The security contract does not contain provisions for assigning security officers to schools based on gender. Since it is more appropriate for male officers to conduct searches



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## OTHER MATTERS OF INTEREST

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on male students, and female officers to conduct searches on female students, we believe there should be a sufficient number of female and male officers based on the male-to-female ratio of the DCPS student population.

Although our sample included 22 females and 8 males, we found the percentage of male-to-female students in the school system is about 50-50. The table below shows the gender breakdown for the student population.

**Table 2. Gender Breakdown for Student Population**

Gender	Number of Students	Percent
Females	32,273	49.60%
Males	32,826	50.40%

Source: DCPS' website

Although the contractor stated that its best high school security officers were females, we believe the ratio of male-to-female officers should be representative of the student population at all grade levels. Ten of the security officers included in our sample were assigned to high schools, and of the 10, 8 officers were females.

**Age.** We were advised that inappropriate relationships between students and younger officers were a cause of concern, thus prompting our look at this area. The security contract stipulates each contractor employee must be at least 21 years old. However, the contract does not contain provisions for assigning security officers to schools based on age. We found all 30 security officers included in our sample were at least 21 years old, as required. The ages of the females ranged from 21 to 54 years old. The median age for the females was 27 years old, and the average age was 32 years old. The ages for the males ranged from 22 to 59 years old, with the median age being 32 years old, and the average age being 37 years old.

In addition, we found that security officers over age 40 were generally not assigned to high schools, and the age for the officers assigned to high schools, for the most part, ranged from 23 to 27 years old.

**Education Level.** The contract stipulates each contractor employee must possess a high school diploma or a general education development (GED) equivalency. We found 28 of the sampled 30 security officers had a school diploma or GED equivalency, as required. In fact, we found some security officers had an education level exceeding the contract requirement. For example, four security officers pursued a college education, with one officer obtaining an Associates Degree in Criminology. In addition, four other security officers obtained certificates or diplomas at institutions other than colleges.

## OTHER MATTERS OF INTEREST

We could not verify that two security officers met the education requirements because their personnel files did not contain adequate documentation. Under the education section of the pre-employment application, the applicants did not indicate their high school affiliations. In addition, the check-off lists included in their personnel files did not indicate that the files contained proof of education. Apparently, the contractor knowingly hired the two officers without verifying their education level.

**Security Experience.** The security contract stipulates security officers must have experience in law enforcement, physical security military training, or any combination thereof. The contract does not contain provisions for assigning officers to schools based on their experience. However, we believe the most experienced officers should be assigned to high schools and problematic schools because they are better equipped to deal with the students.

In our sample, we found only 7 of the 10 officers assigned to high schools had more than 1 year of security experience. The following table shows the security experience for the security officers included in our sample.

**Table 3. Security Experience for Sampled Security Officers**

School Assignment	Experience Level					
	1 year or less	2 years-3 years	4 years-5 years	6 years-7 years	8 years-9 years	10 years or over
High School	3	4	1		1	
Junior High School	4	1				
Elementary School	4	3	2			1
Facilities Office	1	2		1	2	
<b>Total</b>	<b>12</b>	<b>10</b>	<b>3</b>	<b>1</b>	<b>3</b>	<b>1</b>

## RECOMMENDATIONS

We recommended that Superintendent, D.C. Public Schools, in coordination with the Chief of Police, Metropolitan Police Department:

8. Ensure that all security guard employees provide documented proof of their education prior to employment.
9. Establish a plan of action that addresses the diversity of the workforce to better reflect the diversity of the student body in the DCPS.

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## **OTHER MATTERS OF INTEREST**

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### **DCPS' RESPONSE**

DCPS concurred with Recommendation 9, but DCPS did not concur with Recommendation 8. DCPS stated Recommendation 8 is redundant of Recommendation 3. DCPS' full response is included at Exhibit B.

### **MPD'S RESPONSE**

MPD has provided detailed actions taken and planned to address all of above recommendations and correct noted deficiencies. MPD's full response is included at Exhibit C.

### **OIG'S COMMENT**

Although DCPS did not concur with Recommendation 8, DCPS concurred with Recommendation 3. We consider DCPS' and MPD's actions to be responsive to the above recommendations and meet the intent of the recommendations.

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## OTHER MATTERS OF INTEREST

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<h3>ENFORCEMENT OF DISCIPLINARY ACTIONS</h3>
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#### DISCUSSION

One of the 30 security officers included in our review had disciplinary problems. However, the contractor failed to take immediate action on supervisory recommendations to terminate this armed security officer. Instead, the officer, who was operating under a commercial contract, was reassigned to work under the DCPS contract.

Initially, this employee was charged with unsatisfactory work performance and insubordination, which resulted in an official reprimand issued on March 14, 2003. On March 15, 2003, the same individual was charged with “unsatisfactory work performance, insubordination, leaving post without permission, leaving post without being properly relieved, abandoning post, and abandonment of position.”

The supervisor recommended the individual be terminated, and the following comments, also dated March 15, 2003, were included in the security officer’s file:

work performance is unacceptable, the manager has requested on two different occasions to have the officer replaced. I recommend that I would give her another opportunity to perform better, however, she has not shown any improvement

Despite this recommendation, the security officer qualified for a firearm license on June 7, 2003, and qualified as a sharpshooter on December 1, 2003, in a National Rifle Association law enforcement course. Subsequently, the contractor assigned the officer to the DCPS Facilities Office, which requires armed personnel to provide 24 hour surveillance of DCPS properties.

The DCPS contract stipulates the following cause is reason to remove personnel assigned to the contract:

Abandonment of post or trouble with following post orders. Neglect of duty, including sleeping while on duty, unreasonable delays or failure to carry out assigned task, conducting personal affairs during official time, and refusing to render assistance or cooperate in upholding the integrity of the security program at the DCPS.

When we questioned the contractor’s decision to retain the officer, the office manager stated that the company was in short supply of armed security officers, and therefore retained the officer. The contractor’s files did not contain documentation to justify transferring the

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## OTHER MATTERS OF INTEREST

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officer to the DCPS contract. In addition, the office manager confirmed there was no documentation to support the transfer other than a December 1, 2003, memorandum indicating the officer had been transferred to the DCPS contract.

### CONCLUSION

The security officer's assignment to the Facilities Office rather than a school may have minimized risk to the safety of DCPS faculty and students. However, we believe the security officer should not have been transferred to the DCPS contract given the nature and frequency of the officer's performance problems. We also believe the contractor should have notified DCPS prior to assigning the security officer to the contract. Although we did not note a systemic problem, we believe action should be taken to prevent individuals with serious and/or chronic disciplinary problems from being assigned to the DCPS security contract in order to eliminate the possibility of a security risk at a school facility.

### RECOMMENDATIONS

We recommended that the Superintendent, D.C. Public Schools, and Chief of Police, Metropolitan Police Department:

10. Establish controls to ensure that security contractors report all disciplinary actions to DCPS and MPD.

### DCPS' RESPONSE

DCPS concurred with the recommendation. DCPS stated, "[t]he Division of School Security will work with MPD to obtain any disciplinary reports related to contractor personnel in DCPS facilities." DCPS' full response is included at Exhibit B.

### MPD'S RESPONSE

MPD responded there is no contractual requirement for the contractor to report disciplinary actions; however, MPD responded it will work collaboratively with DCPS to ensure incidents reported to school officials or MPD school resource officers are documented. MPD's full response is included at Exhibit C.

### OIG'S RESPONSE

Although DCPS and MPD responded to the recommendation, their responses did not address implementing controls to ensure that security contractors report all disciplinary actions to DCPS and MPD.

## EXHIBIT A - SUMMARY OF POTENTIAL BENEFITS RESULTING FROM AUDIT

Recommendation	Description of Benefit	Amount and/or Type of Monetary Benefit	Status <sup>2</sup>
1	Internal Control and Compliance. Establishes procedures for coordinating between interested parties to ensure background inquiries are disclosed.	Nonmonetary	Open
2	Internal Control and Compliance. Establishes procedures that will require the MPD to monitor the contractor to assure that all background verifications are performed prior to employment.	Nonmonetary	Open
3	Internal Control and Compliance. Establishes policies and procedures to ensure that the MPD has complete pre-employment documentation for all prospective security personnel.	Nonmonetary	Open
4	Internal Control and Compliance. Establishes policies and procedures for standardizing training courses and curriculum for school security personnel for the District.	Nonmonetary	Closed
5	Internal Control and Compliance. Establishes policies and procedures for training requirements as a stipulation for maintaining security licenses issued by MPD.	Nonmonetary	Closed

<sup>2</sup>This column provides the status of a recommendation as of the report date. For final reports, “**Open**” means management and the OIG are in agreement on the action to be taken, but action is not complete. “**Closed**” means management has advised that the action necessary to correct the condition is complete. “**Unresolved**” means that management has neither agreed to take the recommended action nor proposed satisfactory alternative actions to correct the condition.

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**EXHIBIT A - SUMMARY OF POTENTIAL BENEFITS  
RESULTING FROM AUDIT**

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<b>Recommendation</b>	<b>Description of Benefit</b>	<b>Amount and/or Type of Monetary Benefit</b>	<b>Status</b>
6	Internal Control and Compliance. Establishes policies and procedures for standardizing training courses and curriculum for school security personnel for the District.	Nonmonetary	Closed
7	Internal Control and Compliance. Establishes procedures over course curriculum to ensure the effectiveness of the training of security personnel in the school system.	Nonmonetary	Closed
8	Internal Control and Compliance. Establishes procedure to verify documented proof of educational background of prospective contracted security employees.	Nonmonetary	Open
9	Program Results. Establishes strategy to address diversity of contracted security workforce to reflect the diversity of the student body.	Nonmonetary	Open
10	Internal Control and Compliance. Establishes procedures over disciplinary actions against contracted security personnel.	Nonmonetary	Open

## EXHIBIT B - DCPS' RESPONSE



**children first**  
DISTRICT OF COLUMBIA PUBLIC SCHOOLS

OFFICE OF THE SUPERINTENDENT  
825 North Capitol Street, NE, 9<sup>th</sup> Floor  
Washington, D.C., 20002-1994  
(202) 442-5885 – fax: (202) 442-5026

June 24, 2005

Mr. Austin Anderson  
Interim Inspector General  
Office of the Inspector General  
Government of the District of Columbia  
714 14<sup>th</sup> Street, NW  
Washington, DC 20005

Dear Mr. Anderson:

Thank you for the opportunity to offer a response to your audit titled *Audit of Background and Training of Security Personnel* at the District of Columbia Public Schools (DCPS) (OIG No. 32-2-14GA(c)). The District of Columbia Public Schools' Division of School Security reviewed the report and generally agrees with the report's findings. Attachment A contains DCPS detailed responses to your recommendations.

As you are aware, the control of the school security services and the contract for those services will transfer to the Metropolitan Police Department (MPD) on July 1, 2005. We offer our responses to your report's recommendations with that in mind. Should you have any questions related to this response, please contact Theodore Tuckson, DCPS Acting Executive Director for School Security, at (202) 576-6962 or John Cashmon, the Director of Compliance, at (202) 576-5028.

Sincerely,

Clifford B. Jandy, Ed.D.  
Superintendent

CBJ: jc

cc: Charles H. Ramsey, Chief of Police  
Robert C. Rice, Special Assistant to the Superintendent

*"Children First, Their Future is Now!"*



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## EXHIBIT B - DCPS' RESPONSE

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### Attachment A

**District of Columbia Public Schools  
Response to Audit of Background and Training of Security Personnel  
at the District of Columbia Public Schools (OIG No. 03-2-14GA(c))**

We recommend that the Superintendent, D.C. Public Schools, and Chief of Police, Metropolitan Police Department:

**Recommendation 1.:** Coordinate with the security services contractor to ensure that the criminal histories and results for security personnel are disclosed to all interested parties.

**DCPS Response:** DCPS concurs with the recommendation. We will provide any information that we receive related to criminal histories or convictions to any future security contractor.

**Recommendation 2.:** Monitor the school security contractor to ensure that background verifications for all prospective security personnel prior to employment.

**DCPS Response:** DCPS concurs with the recommendation. We will take steps to monitor any future DCPS contractor who provides security services to ensure that the required background checks are performed.

**Recommendation 3.:** Periodically review the contractor's background verification files to ensure that employment files are complete and required documentation has been obtained for each employee.

**DCPS Response:** DCPS concurs with the recommendation. We will monitor any future school security contractor to ensure that the contractually required background checks are performed and that the files contain the required documentation.

We recommend that the Chief of Police, Metropolitan Police Department, in coordination with the Superintendent, D.C. Public Schools:

**Recommendation 4:** Identify the training courses and curriculum that school security personnel must satisfy to maintain proficiency, and incorporate these standards in the new policy manual.

**DCPS Response:** DCPS concurs with the recommendation. As part of the transition process for the school security services, the Acting Executive Director for School Security has provided the team from the Metropolitan Police Department with this information.

DCPS did not respond to recommendations 5 through 7. These recommendations are solely the purview of the Metropolitan Police Department and their operation of the school security contract that commences on July 1, 2005.

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## EXHIBIT B - DCPS' RESPONSE

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### Attachment A

We recommend that the Superintendent, D.C. Public Schools, in coordination with the Chief of Police, Metropolitan Police Department:

**Recommendation 8:** Ensure that all security guard employees provide documented proof of their education prior to employment.

**DCPS Response:** DCPS does not concur with this recommendation. This recommendation is redundant. The report's recommendation number 3 states that DCPS and the Metropolitan Police Department should verify that employee files are complete and that the required documentation be obtained from each employee. The education level that the employee attained is a portion of that required documentation.

**Recommendation 9:** Establish a plan of action that addresses the diversity of the workforce to better reflect the diversity of the student body in the DCPS.

**DCPS Response:** DCPS concurs with the recommendation. In any future school security services contract, the Division of School Security will require that the contractor work with the DCPS Office of Human Resources to expand the recruitment efforts to match the diversity of the DCPS student body.

**Recommendation 10:** Establish controls to ensure that security contractors report all disciplinary actions to DCPS and MPD.

**DCPS Response:** DCPS concurs with this recommendation. The Division of School Security will work with the Metropolitan Police Department to obtain any disciplinary reports related to contractor personnel in DCPS facilities.

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## EXHIBIT C - MPD'S RESPONSE

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GOVERNMENT OF THE DISTRICT OF COLUMBIA  
METROPOLITAN POLICE DEPARTMENT



05 JUL 11 PM 2:00

JUL 8 2005

Mr. Austin A. Andersen  
Interim Inspector General  
Office of Inspector General  
717 14<sup>th</sup> Street, NW  
Washington, D.C. 20005

Dear Mr. Andersen:

Thank you for the opportunity to review your draft report entitled, "Audit of Background and Training of Security Personnel at District of Columbia Public Schools," OIG No. 03-2-14GA(c). For the school year you reviewed (2003-2004), the Metropolitan Police Department's (MPD) role in school security was limited to the licensing of security personnel through the Security Officers Management Branch (SOMB), in accordance with 17 DCMR § 2000 *et al.* During the time period covered by the Audit, the District of Columbia Public Schools (DCPS) managed the contract for school security. However, pursuant to the School Safety and Security Contracting Procedures Act of 2004 (D.C. Law 15-350) ("School Safety Act"), MPD assumed responsibility for procuring and delivering security services to DCPS effective July 1, 2005. I accept the 10 recommendations contained in your draft report, and will address them in light of our new security oversight role. After addressing your recommendations, I will address two additional issues - one regarding the SOMB handbook and the second regarding your use of "SRO" in your draft report.

**Recommendations:**

- 1. Coordinate with the security services contractor to ensure that the criminal histories and results of inquiries for security personnel are disclosed to all interested parties.**
- 2. Monitor the school security contractor to ensure that background verifications are performed for all prospective security personnel prior to employment.**
- 3. Periodically review contractor background verification files to ensure that employment files are complete and require documentation has been obtained for each employee.**

As indicated above, MPD will now be responsible for coordination with and monitoring of the school security contractor, to ensure that proper personnel documentation is in each file. In order to administer the new contract for school security services, MPD has hired a Contracting Officer's Technical Representative (COTR) and two contract compliance monitors in our Office of Corporate Support, Contract Monitoring Unit.

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P.O. Box 1606, Washington, D.C. 20013-1606

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## EXHIBIT C - MPD'S RESPONSE

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These employees will work with SOMB to ensure that criminal history reports are obtained and maintained for all prospective school security contractors through the following procedures. The contractor is required to provide to the COTR a daily listing of all guards submitted for certification to SOMB. SOMB certifies, through an FBI background check, whether a guard is eligible to work with children under the Child and Youth, Safety and Health Omnibus Amendment Act of 2004 and its implementing rules. SOMB provides a listing to the MPD COTR, and simultaneously to the contractor indicating the approval or non-approval of each applicant. The contractor then submits to the COTR a letter that certifies that each SOMB-approved guard has met all contract requirements (i.e., licensing requirements, training hours, building orientations, passed final examinations, etc.).

Daily, the contractor provides a guard assignment list to the COTR, which identifies the guards assigned to each school. That listing is reviewed by the COTR and compliance monitors to ensure that only the guards that have received SOMB approval are deployed. MPD's contract monitoring team will conduct random site visits to verify the accuracy of the information provided by the contractor and to ensure contract compliance. The COTR and contract monitoring team will also conduct random reviews of contractor files to verify personnel certifications. Finally, the contract requires the contractor to submit semi-annual independent audit reports to the COTR for review of findings and to follow-up on corrective actions.

This process described above has already proven to be effective at screening out ineligible applicants, resulting in the exclusion of 10 contract security personnel formerly assigned to DCPS by the previous contractor. The excluded personnel were found to have the following convictions: 1) Assault with a Dangerous/Deadly Weapon; 2) Possession of Marijuana; 3) Carnal Knowledge; 4) Distribution of Cocaine; 5) Theft 2; 6) Larceny; 7) Uniformed Controlled Substance Act; 8) Simple Assault; and 9) Carry a Pistol without a License/Unregistered Firearm. Of the 10 disqualified persons, two failed to declare a charge on the affidavit required of prospective security personnel.

The COTR and compliance monitors will continue to work with SOMB to ensure that MPD obtains and maintains all required background information for prospective school security contract employees. The files for school security personnel are maintained separately from all other security guard files at SOMB. All of these files have been standardized and updated, allowing for ready access and auditing of documentation. Files will be reviewed by SOMB no less than annually when school security personnel renew their licenses. More frequent scrutiny may be initiated by either SOMB or the COTR.

In its solicitation for the school security contract, MPD also specified penalties for the contractor if it employs an individual ineligible to work with children because of the individual's criminal background. Section H.8, *Liquidated Damages*, of Solicitation POFA-2005-D-0003 establishes that the contractor must pay \$1,000 for "...each employee Contractor provides to the District that is subsequently determined to be a prohibited employee under the [Child and Youth, Safety and Health Omnibus Amendment Act of 2004.]" We believe MPD scrutiny (by the COTR, compliance safety monitors, and SOMB) and the contractor's professionalism and financial incentive will significantly enhance the likelihood that only qualified security personnel are assigned to schools.

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## EXHIBIT C - MPD'S RESPONSE

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**Recommendations:**

- 4. Identify the training courses and curriculum that school security personnel must satisfy to maintain proficiency, and incorporate these new standards in the new policy manual.**
- 5. Establish requirements that school security personnel must attend and pass all required courses to maintain the license MPD issues for contracted school security personnel.**
- 6. Establish a policy to suspend or recall a license issued to school security personnel when required training has not been obtained or a passing grade not achieved.**
- 7. Amend MPD policy establishing MPD oversight over contractor's course curriculum to ensure that: (a) the required courses are given to school security personnel; (b) essential training standards are maintained to achieve course effectiveness; and (c) all training records are maintained to support grades and test scores.**

The basic training curriculum for contract security personnel includes 47 hours of topics ranging from "Conduct on Duty" to "First Aid/CPR" (Section C.9.3, POFA-2005-D-0003). In addition to the basic curriculum, security contractor personnel must complete 40 hours of training in subjects mandated by the School Safety Act. The mandated training includes: 1) child development; 2) effective communication skills; 3) behavior management; 4) conflict resolution; 5) substance abuse and its effect on youth; 6) availability of social services for youth; 7) District of Columbia laws and regulations, including Board of Education regulations; and 8) constitutional standards for searches and seizures conducted by school security personnel on school grounds.

The COTR and compliance monitors are ensuring that all contract security personnel receive basic and legally mandated training. Before any training can occur, the contractor is required to obtain MPD's approval of the proposed training curricula. At the conclusion of any training provided to contract security personnel, a mandatory test is given, which is proctored by the COTR and/or one of two compliance monitors.

This more rigorous program of training and testing is already showing results. The basic curriculum test recently administered to prospective contract security personnel resulted in several failures. "Individuals who fail the test will be required to retake the Basic Training within 60 days of their testing failure date, and (within this 60 day period) be retested by the independent testing consultant. Failure to pass the test after retaking the Basic Training Curriculum will render the individual ineligible to work on the contract" (Solicitation POFA-2005-D-0003, Section C.9.11). The COTR and/or contract monitoring team randomly review the actual grading of each test and the accountability of each testing instrument. The COTR also maintains a file of all contract guards' exam percentage, as proof that each guard either passed or failed the exam, and will cross-reference this information against the roster of approved contract security personnel.

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## EXHIBIT C - MPD'S RESPONSE

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**Recommendation:**

**8. Ensure that all security guard employees provide documented proof of their education prior to employment.**

Evidence of education is obtained and placed in the employee's personnel file by the employer. The COTR and compliance monitors will audit these files to ensure that they contain required educational documentation.

**Recommendation:**

**9. Establish a plan of action that addresses the diversity of the workforce to better reflect the diversity of the student body in the DCPS.**

The MPD recognizes the benefits of a workforce reflective of those it serves. Notwithstanding the exacting standards that were placed in the solicitation for security services, no requirement was made for the contracted security workforce to reflect the diversity of the student body.

We have asked the contract security agency to consider the diversity of the schools in which it deploys personnel to ensure, where possible, that the deployment reflects the demographics of the school.

**Recommendation:**

**10. Establish controls to ensure that security contractors report all disciplinary actions to DCPS and MPD.**

While there is no contractual requirement for the contractor to report disciplinary actions, MPD and DCPS will work collaboratively to ensure that incidents coming to the attention of school officials or MPD school resource officers are documented. If MPD is dissatisfied with the contractor's response to an incident involving a contract security employee, Section C.18.2 of the contract provides, "At any time the MPD COTR, in its sole discretion, may require the contractor to immediately remove any employee from the contract. Replacement personnel shall be provided immediately." MPD will not hesitate to exercise this option, as necessary.

**SOMB Handbook**

We recognize that the SOMB handbook needs to be updated. A new handbook will be completed by October 1, 2005. It will be dated and considered for updating no less than biannually. Secondly, the SOMB command official maintains that the unit currently employs a checklist to ensure that all required documentation is maintained in an individual's licensing file. Since licenses are renewed annually, if any files are found to be incomplete, they are rectified immediately. Additionally, periodic internal audits are performed to ensure completeness of individual files. Yearly FBI returns with arrest records are reviewed by an official of the rank of sergeant or above for approval.

While there is a standard operating procedure in effect to ensure that all files are compiled in the same manner to ease access and review, past practices have not always been followed and files were not always compiled accurately. Current SOMB management has addressed this issue. Today, files are being maintained properly and staff has been trained. Copies of both the updated SOMB handbook and the checklist will be provided for your review after approval.

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## EXHIBIT C - MPD'S RESPONSE

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MPD recognizes the important role that school security guards play in ensuring the safety of the District's schools. As part of a broader effort to reform standards for the security guard industry and its employees, the Administration has committed to working with the City Council and key stakeholders to ensure that the District has a regulatory system that best meets the needs of the city. To this end, the Mayor has committed to convening a working group to develop a system of special licenses to provide for enhanced requirements - such as for training and background checks - for different categories of security personnel. The development of such specialized licenses for school security contractors will, through licensing review, reinforce the efforts of the COTR and compliance monitors to ensure that school security personnel are eligible and qualified to perform under the applicable law, regulations, and contract.

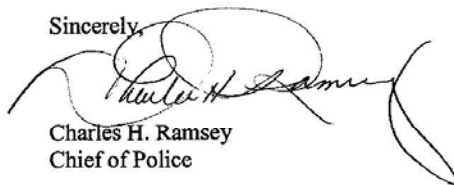
### SRO

SRO is used by MPD and other law enforcement agencies as their acronym for "school resource officer," a sworn police officer assigned to a school. Your use of SRO in the draft report to represent a contract security officer "CSO" or special police officer "SPO" was inconsistent with the common use of the acronym. I ask that you modify your report to reflect CSO (a licensed, contract security officer with non-police authority), SPO (a commissioned special police officer with police authority at a property or properties designated by his/her commission) or other appropriate term to clarify the distinction.

Again, thank you for the opportunity to comment on your draft report. I believe we have made excellent progress, in partnership with DCPS, towards providing a safe and secure learning environment for every child enrolled in public schools throughout the District of Columbia. I concur with your statement that "...the comprehensive plan for school security and the recent Child and Youth, Safety and Health Omnibus Amendment Act of 2004 appear to address and in some respects remedy, the deficiencies noted in the report." We will closely monitor implementation of our plan, modifying it as necessary to enhance the potential for success.

Finally, I have provided our Comprehensive Plan to implement the School Safety Act of 2004 and Solicitation No. POFA - 2005-D-0003 for your review. Please feel free to contact my Assistant Chief, Office of Security Services, Chief Gerald M. Wilson, or me with any questions or concerns that you may have. Assistant Chief Wilson can be reached at (202) 439-9663.

Sincerely,



Charles H. Ramsey  
Chief of Police

Attachments (2)

c: Mr. Robert C. Bobb, City Administrator  
Mr. Edward D. Reiskin, Deputy Mayor for Public Safety and Justice  
Dr. Clifford B. Janey, Ed.D., Superintendent, District of Columbia  
Public Schools

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## EXHIBIT D - WATKINS, INC.'S RESPONSE

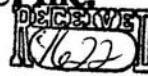
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### Watkins Security Agency of DC, Inc.

5325-B East Capitol St., S.E.

Washington, D.C. 20019



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Office: 202 - 581 - 2871

Fax: 202 - 581 - 2875

Email: watkinssec@aol.com

Richard A. Hamilton  
President / CEO

June 28, 2005

Austin A. Andersen  
Interim Inspector General  
Office of the Inspector General  
717 14<sup>th</sup> Street, NW  
Washington, DC 20005

Mr. Andersen:

We are in receipt of your draft audit report summarizing the results of the Office of the Inspector General's (OIG) Audit of Background and Training of Security Personnel at District of Columbia Public Schools (OIG No. 03-2-14GA(c)) dated June 15, 2005. The report contains two findings regarding: (1) Pre-employment Hiring Process, and (2) Security Officer Training. The report also contains a discussion of two "Other Matters of Interest:" (1) Demographics/Diversity of the Security Staff, and (2) Enforcement of Disciplinary Actions. While a substantial portion of the report relates to the actions and responsibilities of DC Public Schools and the DC Metropolitan Police Department (MPD), much of the report also centers on Watkins Security Agency of DC, Inc. and its business practices as the security contractor for DCPS. Accordingly, we feel it necessary to provide the following response to the draft report.

Prior to discussing specific recommendations, it is important to note that DCPS has engaged in several instances of improper contract administration in connection with Watkins's security contracts. This improper contract administration, for which Watkins has no responsibility, has caused Watkins to suffer substantial loss in connection with these contracts. In fact, as identified in the report, Watkins has itself raised some of the issues discussed in this report as an effort to clarify and comply with requirements in its contracts. As such, Watkins believes that at present, any deficiencies on the part of Watkins have been properly addressed.



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## EXHIBIT D - WATKINS, INC.'S RESPONSE

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### Finding 1: Pre-Employment Hiring Process

The report's conclusion:

In the section entitled Synopsis, the report states the following: "Internal control weaknesses in the pre-employment hiring process of DCPS contract security personnel led to the questionable placement of some SROs working in the District's school system." According to the report, the cause of these conditions relate to:

- (1) The need for the security contractor and MPD to coordinate information;
- (2) The need for the security contractor to consistently perform background investigations;
- (3) The contractor and MPD's need to maintain pre-employment documentation;
- (4) DCPS need to provide sufficient oversight and monitoring;

Our responses:

**(1) The need for the security contractor and MPD to coordinate information:**

As clearly outlined in the report, it is MPD's responsibility, not Watkins's, to conduct criminal background investigations on new employees. Watkins simply transmits security guard license applications to MPD so that MPD can conduct the investigation as part of its licensing process. Watkins, or any other contractor for that matter, must rely on MPD to conduct thorough, accurate background investigations so that no security guards with an inappropriate criminal background are hired.

Watkins also relies upon MPD to provide information to Watkins regarding falsified pre-employment documents. Until MPD performs its criminal background investigation and responds back to Watkins with evidence that an applicant has falsified pre-employment documents, Watkins does not have knowledge of such falsifications and therefore can not be expected to take actions based upon knowledge that it doesn't possess. Watkins has always

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## EXHIBIT D - WATKINS, INC.'S RESPONSE

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acted timely and in accordance with its contract when advised of falsified information by the MPD

Accordingly, this section should be changed to clearly reflect that any deficiencies in this area have been caused by MPD's failure to provide contractually-required information to Watkins. Thus, with regard to paragraph (1) of Finding 1, we suggest the following alternative wording:

"The need for MPD to ensure the accuracy of its background checks and to share information with the security contractor information related to possible falsified pre-employment documents."

(2) The need for the security contractor to consistently perform background investigations;

Watkins performs thorough evaluations of each prospective employee. In this regard, we believe that this section of the report is misleading.

Watkins's hiring process requires that each applicant complete an application that requests all of the information required under the DCPS contract, including references and authorizations to perform a credit check. In addition, each prospective security guard is interviewed and administered a reading comprehension test before being invited to participate in the training phase. The interview and testing phase is, in our view, the most valuable part of our employment process in terms of identification of the strongest applicants and elimination of the weakest applicants. We estimate that only one in every five applicants is ultimately hired by Watkins as a security guard. Thus, we are able to pre-screen and avoid hiring most problem candidates. This is the same screening process that we use for other clients, including private Fortune 500 firms.

As discussed above, the MPD is required to perform an extensive background investigation for each candidate. Watkins is required to evaluate all of the information collected through the hiring process, including any criminal background and licensing information, before making a hiring decision. The report infers that unspecified risk would be realized if certain additional background investigations were not conducted. This is not the case. In the first instance, there is no requirement that the security contractor disqualify a candidate on the basis of the results of these additional investigations. As

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## EXHIBIT D - WATKINS, INC.'S RESPONSE

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such, there is no evidence that the workforce would be any better—or even any different—if these investigations were consistently conducted.

Moreover, based on our extensive history in law enforcement and in the security industry, we believe that the criteria emphasized by the audit—credit history, personal references and previous employer reference checks—are not reliable predictors of whether a particular applicant will be a good or bad security guard. We generally find that an applicant's credit history is of little value in identifying good or bad security guards because the financial position of the applicant pool is such that a high percentage of applicants are likely to have low credit scores. Similarly, we do not believe personal character references provided by the applicants are good predictors. Most applicants simply provide character references they know will give them a positive reference. Therefore, following up with character references is very unlikely to provide us with information that would assist us in determining whether the applicant is a good or bad hire. Likewise, with regard to employment reference checks, most employers are unwilling to provide evaluative information on former employees given the very real threat of litigation in such instances. At most, they will simply confirm that the former employee worked with them during a certain time period. As such, very little valuable information is revealed in the employment history check as well.

Finally, the draft report does not set forth any facts that demonstrate where our failure to conduct these investigations led to the hiring of a high-risk security guard on the DCPS contract. Nor does the draft report provide an example of where our acquiring such information would have prevented us from hiring a high-risk security guard. Accordingly, the draft report has not set forth facts to support the assertion that our failure to conduct these investigations resulted in the hiring high risk staff. Therefore paragraph (2) should either be removed from the report or any discussion of this issue should be moved to the section entitled "Other matters of Interest."

**(3) The contractor and MPD's need to maintain pre-employment documentation;**

Watkins has made significant progress on this item, despite very difficult circumstances caused by DCPS's failure to provide required information at the inception of the contract. Watkins was provided only 20 days to become fully operational on the DCPS security contract. We could only meet this time deadline requirement by recruiting and hiring most of the DCPS school security

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## EXHIBIT D - WATKINS, INC.'S RESPONSE

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guards from the outgoing DCPS school security contractor. During this transition phase we requested, *but never received*, the employee records for the security guards hired from the outgoing contractor. These employees continue to represent a majority of the DCPS security guard force. As a consequence, most of the documentation problems cited in the draft report have their origin in the transition phase of the DCPS contract.

In fact, as demonstrated in the attached memos entitled, "Security Training Plan" dated August 22, 2003 and "Status Report of Security Contract" dated January 12, 2004, Watkins itself identified this issue to the District in connection with documentation of training for the guards that were hired from the previous contractor. Watkins proactively addressed this issue by hiring a new Project Director on the DCPS contract and by developing and implementing a plan to complete supplemental training courses for all guards by February 2004. The events at Ballou High School in February set back completion of this process by a few months so that our process was not completed by the time OIG was reviewing our files during the late spring/ early summer months of 2004.

As of the date of this letter, we can confirm that with the exception of training information that DCPS failed to supply from the previous contractor, all of the personnel records contain the information required under the contract. Accordingly, we believe that the discussion of documentation issue should be removed from the final report or presented in a fashion that explains the current status of the documentation.

### Finding 2: Security Officer Training

The report's conclusion:

- (1) Many of the files did not contain the actual score of the, but contained some other mark indicating that the course had been taken and passed by the applicant.
- (2) The search and seizure course conducted by the security contractor

Our response:

- (1) This issue was addressed above under our response to Finding 1. As the report indicates, Watkins identified this issue, notified DCPS, and began taking corrective actions. OIG has been provided with information that demonstrates

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## EXHIBIT D - WATKINS, INC.'S RESPONSE

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that this issue has been satisfactorily addressed and that, as a result, Watkins' reporting of test scores has improved. Because Watkins has identified and addressed this issue such that OIG is able to note improvement, there is no reason to include it in the report. We therefore recommend that it be removed. At a minimum, a statement should be included in the Synopsis that this issue has been addressed and that improved documentation has resulted, rather than in a short sentence at the end of the entire section.

(2) Our instructors have completed all the necessary training requirements and are certified by accredited security guard training organizations. All of the training materials are purchased from the Professional Security Trainers Network and, therefore, represents the industry standard in terms of course content. DCPS does not provide additional guidance regarding the content or techniques utilized in the training program. Watkins emphatically supports the development of such standards on the part of DCPS.

Moreover, the draft report should have noted that the search and seizure course is not required by the DCPS contract, but is an additional course provided at the recommendation of Watkins management. It should also be noted that, prior to this date, DCPS has never expressed any dissatisfaction with any of the content of the training courses provided by Watkins.

### Other Matters of Interest

#### Demographics/Diversity

We hire guards that reflect the labor pool from which we recruit. We currently recruit guards by placing ads in the leading newspapers in the Washington, DC region [any Hispanic publications?] and by utilizing programs operated or funded by the District of Columbia's Department of Employment Services. As is required under the contract, Watkins is an equal opportunity employer and, as such, we do not discriminate against applicants on the basis of race. It should also be noted that the First Source agreement restricts the pool from which any security contractor can pull applicants because 51% of all new hires must be DC residents. As is noted above, the security guard services industry is characterized by high employee turnover. Therefore, the First Source agreement significantly limits the pool from which our applicants are recruited. Therefore, OIG should be aware that requirements on "diversifying" the security guard pool may be particularly burdensome for any DCPS school security contractor.

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## EXHIBIT D - WATKINS, INC.'S RESPONSE

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### Enforcement and Disciplinary Actions

There are many factors that must be considered in placing a particular security guard at a particular site. A lot of the issues that must be considered have more to do with personalities and the "fit" of the particular guard within a particular environment. Things are not as "cut and dry" as they may appear on paper. In this instance, the security contractor is in a better position to know all of these variables to such an extent to be able to make the right decision in these matters. Therefore DCPS would be best served by empowering the security guard services contractor to investigate and make decisions that, in its judgment, facilitate its ability to deliver the services required by the contract. Moreover, DCPS has itself publicly praised Watkins for its proactively removing guards from posts where problems were brought to our attention.

  
President / CEO  
Watkins Security Agency of DC, Inc.